



CITY OF EAST CHICAGO

Anthony Copeland, Mayor

EAST CHICAGO WATER DEPARTMENT

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March 8, 2017

Margaret M. Guerriero
Acting Director
Superfund Division
U.S. EPA
77 W. Jackson Blvd.
Chicago, IL 60604

RE: East Chicago Lead Service Line Replacement Program within USS Lead Superfund Site

Dear Ms. Guerriero:

I'm writing to inform you of the City of East Chicago's (*City*) intent to perform lead service line replacements within the USS Lead Superfund Site beginning in spring 2017. The U.S. EPA Drinking Water Division performed a pilot study collecting sequential samples of drinking water at the taps of 43 homes within the Superfund Site during the fall of 2016 to quantify the impact of excavation and soil remediation activity on buried water service lines. The results of the pilot study indicated that drinking water in 18 of 43 (or approximately 40%) of the homes sampled had lead levels in excess of the U.S. EPA Action Level of 15 parts per billion (ppb). In response to the findings of the report, the City has pursued several measures, including increasing the dosage rate of orthophosphate for corrosion control throughout the distribution system, and contacting several local, state, and federal agencies to secure additional support to address widespread concern among local residents.

The City is working with several agencies within the State of Indiana, primarily through Governor Holcomb's office to secure funding and resource support for the replacement of all lead service lines in impacted areas of the City. Recently, Governor Holcomb issued an Emergency Declaration in response to the City's request for additional support. Beginning in spring 2017, the City proposes to replace lead service lines in the Superfund Zones concurrent with the U.S. EPA's remediation schedule. In addition, the City proposes to revisit 55 homes within the Superfund Zones that were remediated last year by the U.S. EPA in order to perform lead service line replacements. An initial, near-term step proposed by the City's plan is to provide a NSF-53 kitchen tap filter for each home in order to protect residents from potential lead-contaminated drinking water concerns.

The City would like to work concurrently with the U.S. EPA for coordination with lead service line replacements, beginning with outreach communication to residents. During the U.S. EPA homeowner

outreach meetings within the Superfund Zones, the City would like to send a representative to discuss the lead service line replacement program and make arrangements for the resident to receive a kitchen tap filter. At this meeting, the City's representative will also schedule a time for pre-excavation water sampling of lead and phosphate.

The requested sequence of operations for the lead service line replacement is: 1) U.S. EPA contractors will perform excavation and removal of contaminated soils in a residential yard, 2) City plumbing contractors will perform lead service line replacement, and 3) U.S. EPA contractors will provide clean fill upon completion.

An exception to this approach will be for the 55 homes within the Superfund Zones that were remediated last year. The City proposes to revisit these homes in order to perform lead service line replacements. The City's plumbing contractors will use a trenchless method to replace the service line, where possible, to reduce the amount of soil excavation required. By deploying a trenchless method, two holes; one at the water main connection in the street and one at the curb stop, will need to be dug to replace the service line. With this approach, the City requests that the U.S. EPA dispose of any contaminated soil from this excavation. The City's contractors will provide clean fill upon completion.

The City is sensitive to the U.S. EPA's expected near-term timing of April 17, 2017 for resuming soil remediation and clean-up activity within the Superfund Zones. In an effort to work in conjunction with U.S. EPA, the City anticipates utilizing funds from current operations, in anticipation of eventually receiving funding relief from the State of Indiana. The City has already begun outreach to several local plumbing contractors in preparation of project bidding.

The City looks forward to working with the U.S. EPA in a collaborative manner on this very important initiative.

Respectfully submitted,



Gregory D. Crowley, P.E.
Director of Utilities

cc: Honorable Mayor Anthony Copeland
East Chicago City Attorney, Carla Morgan
East Chicago Department of Water Works Board of Commissioners